

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

12-03-07  
04:59 PM

Order Instituting Rulemaking to Implement the	)	
Commission's Procurement Incentive Framework	)	
and to Examine the Integration of Greenhouse Gas	)	
Emissions Standards into Procurement Policies	)	

Rulemaking 06-04-009  
(Filed April 13, 2006)

**COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC.  
ON THE ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS  
ON TYPE AND POINT OF REGULATION ISSUES**

Catherine M. Krupka  
Adam J. Katz  
McDermott Will & Emery LLP  
600 Thirteenth Street, NW  
Washington, DC 20005  
Tel: (202) 756-8000  
Fax: (202) 756-8087  
Email: ckrupka@mwe.com  
ajkatz@mwe.com

December 3, 2007

*Attorneys for Morgan Stanley Capital Group Inc.*

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies	) ) ) )	Rulemaking 06-04-009 (Filed April 13, 2006)
---	------------------	--

**COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC.  
ON THE ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON  
TYPE AND POINT OF REGULATION ISSUES**

**I. INTRODUCTION**

Pursuant to the November 9, 2007 ruling of Administrative Law Judges Charlotte F. TerKeust and Jonathan Lakritz, Morgan Stanley Capital Group Inc. ("MSCG") respectfully submits its comments on the type and point of regulation for the electricity sector to reduce greenhouse gas ("GHG") emissions in California.<sup>1</sup>

**II. COMMENTS**

As noted by MSCG at Commission-sponsored symposia and in comments filed with the California Public Utilities Commission, the California Energy Commission, and the California Air Resources Board, MSCG believes that a source-based approach to cap-and-trade in California is superior, from both a policy and legal perspective, to either a load-based or first-seller approach.<sup>2</sup> MSCG reiterates its support for a source-based market construct and reserves its right to further comment in this proceeding on market design issues in support thereof.

---

<sup>1</sup> Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation Issues, Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies (Docket No. R.06-04-009) (issued Nov. 9, 2007).

<sup>2</sup> See, e.g., Load-Based v. Source-Based Systems, presented by MSCG at the Commission's *Greenhouse Gas Cap and Trade Systems: Symposium on Linking* (Apr. 19, 2007), available at <http://www.cpuc.ca.gov/static/Energy/Electric/climate+change/oliviahartbridge.ppt>; Comments of Morgan Stanley Capital Group Inc. on Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol (filed with the CPUC and CEC in this proceeding on July 2, 2007); Comments of Morgan Stanley Capital Group in Response to Recommendations of the Market Advisory Board to the California Air Resources Board (filed with CARB June 1, 2007).

**A. General**

**Q1. What do you view as the incremental benefits of a market-based system for GHG compliance, in the current California context?**

See response to Q2, below.

**Q2. Can a market-based system provide additional emissions reductions beyond existing policies and/or programs? If so, at what level? How much of such additional emission reductions could be achieved through expansion of existing policies and/or programs?**

A market-based system for GHG compliance would deliver to California the statutorily mandated reduction in GHG emissions at the least overall cost to end users and would be best equipped to ensure compliance. This will occur primarily because a market-based system will allow market participants to consider all possible compliance options rather than just those that California has prejudged to be acceptable.

In support of its position, MSCG notes the following points. First, investment capital ultimately would flow to those ideas that prove to be most efficient and cost-effective. Capital that the market “wastes” on ideas that later prove to be ill-conceived cost consumers nothing. In comparison, capital invested only in technology that California deems appropriate based on limited information known today costs consumers in the form of lost opportunity in other solutions and investment in technology that may prove fruitless or sub-optimal.

Second, market-based approaches would lower the overall cost of achieving emissions reductions because they generally cost less to administer. Specifically, allowing the market freedom to choose solutions means that California does not have to monitor whether market participants use specific technologies. Under a market approach, California’s only concern would be that the market has identified solutions that help California meet its GHG emissions reduction goals. How the market achieves this goal becomes less relevant. Market-based approaches also

are less complex than command and control approaches, and are therefore less complex to administer.

**B. Principles or Objectives to be Considered in Evaluating Design Options**

**Q3. Do you agree with this set of objectives? Are there other objectives or principles that you wish to see included? If so, please include your recommendations and reasoning. Finally, please rank the objectives above, and any additional factors you propose, in order of importance.**

Although MSCG agrees that these criteria are important, it does not necessarily agree with the Commission's descriptions of each criterion. For example, with respect to "Goal Attainment," the ruling asks whether "the approach would have any advantages to promoting energy efficiency, combined heat and power, or renewable energy." This is an inappropriate question because it singles out specific technologies for special treatment and is potentially antithetical to another criterion, "cost minimization." Simply stated, if California encourages investment in any particular technology or technologies and those choices are different than those the market would have made, then those choices will result in incremental costs that provide no incremental reduction in GHG emissions. Moreover, those incremental costs will accrue to end users, which would not have occurred if the market had selected the technologies in which to invest.

MSCG also disagrees with the Commission's description of "Environmental Integrity." The Commission defines this criterion in terms of a vexing, but essentially insoluble problem (*e.g.*, contract shuffling and leakage in a non-closed system), which is not constructive. MSCG would amend the criterion to read as follows: "Compliance instruments accurately reflect the amount of emission they purport to represent. Emissions measured or assigned to a point of regulation accurately reflect the GHGs for which that entity is responsible for emitting. Physical measurements are accurate." MSCG's proposed revision better focuses on the end goal and inherently addresses problems such as leakage or shuffling.

Finally, MSCG suggests adding a criterion: “Interoperability with existing and future GHG regulation systems.” If California allows market participants to use allowances and offsets from other jurisdictions, it would provide a crucial price and volume safety valve for situations that would otherwise require loosening of the caps, and result in backsliding on the State’s goal of accounting for and reducing actual emissions.

**C. Load-Based Cap-and-Trade System Design**

- Q4. With a load-based cap-and-trade system, should exports from in-state generation sources be included and accounted for under the cap? Why or why not? If so, how? For example, exports could be captured in a cap-and-trade system by regulating in-state sources that export, or by counting the emissions associated with exported power, without any compliance obligation on the exporter. There may be other options as well.**

No response provided.

- Q5. How extensive do you view the threat of contract-shuffling under a load-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position?**

No response provided.

- Q6. Which of these systems best accounts for all imports? What are the advantages and disadvantages of each potential tracking system in terms of accuracy, cost of development and administration of tracking systems, costs of administration to the parties, and overall costs to ratepayers? Are there alternative tracking approaches that you would recommend, and for what reasons?**

No response provided.

- Q7. If a load-based approach is pursued, would the potential benefits of a full TEAC system be great enough to warrant the start-up and administrative costs?**

No response provided.

**D. Source-based Cap-and-trade System Design Options**

**1. *Pure Source-based (GHG Regulation of In-state Generation Only)***

**Q8. Do you view this approach as compliant with Assembly Bill (AB) 32? Please support your answer.**

See response to Q10, below.

**Q9. In light of the relatively high capacity factors of carbon-intensive facilities outside the state, how extensive do you expect the short-term threat of substituting higher-carbon imports for in-state generation to be? Might this possibility be dealt with through specific program design (e.g., allocations, limiting conditions, etc.)?**

See response to Q10, below.

**Q10. Given existing procurement oversight and the prospect for a regional or federal GHG program in the foreseeable future, how extensive do you expect the threat to be of a longer-term shift of production to regions beyond the reach of a California source-based cap-and-trade regime?**

One can view the threat of leakage over two time horizons: short-term and long-term. In addition, three factors would drive substitution of high-emitting out-of-State resources for low-emitting in-State resources.

First is the capacity factor of existing resources. MSCG has not conducted an analysis of current capacity factors. However, the comments and reports of other parties in this proceeding suggest that high-emitting resources have little spare capacity, which would allow only for minimal short-term switching.

Second, the construction of incremental high-emitting generation capacity could lead to significant opportunities for substitution in the long-term. A variety of market participants have proposed such projects both in nearby states that would connect to the existing grid and in more remote states and provinces that would build long-distance DC power lines to bring coal-fired generation to populous coastal regions. MSCG does not wish to speculate on the likelihood of any

of these proposals being approved and constructed, but notes that the trade press reports the issues, problems, and success rates on a regular basis.

The third factor that influences substitution possibilities is import transmission capacity. The maximum amount of substitution is limited to the maximum amount of available import transmission capacity. California would have to adjust downwardly the available import transmission capacity for the amount that the State already utilizes for bringing high-emitting resources into the State. It also would need to adjust downwardly the amount of import capacity for external congestion issues, such as the fact that some low-emitting units might not be displaceable by high-emitting units for reasons having to do with their location relative to transmission bottlenecks. Conversely, some proposed projects (*e.g.*, the various DC lines from remote locations) come with their own self-contained increases in transmission import capacity.

In summary, MSCG's initial (albeit unscientific) analysis suggests: (1) short-term substitution potential would be minimal to moderate; and (2) mid- to long-term substitution potential seems very high, and the economic justification for such substitution likely exists. However, the degree to which California realizes such economic potential depends upon the outcome of a large number of major generation siting decisions pending before multiple jurisdictions, and the practical difficulties are likely to be great. MCSG has no special insight into how these factors will be resolved, but believes the actual degree of substitution is likely to be much less than that which could be supported by economic considerations alone.

**Q11. If emissions associated with imported power are excluded from a cap-and-trade program, what policies beyond the existing suite of program including energy efficiency, California Solar Initiative, RPS, and Emission Performance Standard (EPS) do you recommend that California employ to achieve the necessary reductions from the electricity sector?**

No response provided.

**Q12. As the Public Utilities Commission does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers (investor owned utilities (IOUs), community choice aggregators (CCAs), electric service providers (ESPs), and publicly owned utilities (POUs)), which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POUs? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POUs?**

No response provided.

**Q13. What sources would a source-based system cover? Could it cover California utility-owned facilities located outside of California?**

No response provided.

**Q14. Would a strengthened EPS assist in reducing emissions due to California imports? What recommended changes would you make to the EPS?**

No response provided.

**2. *Deliverer/First Seller.***

**Q15. Please comment on the “First Seller Design Description” paper, which is Attachment A to this ruling. Does the paper accurately describe the deliverer / first seller program? If not, describe your concerns and include an accurate description from your perspective.**

MSCG believes the First Seller Design Description (“FSDD”) describes adequately the issues and trade-offs inherent to a first-seller system. However, the FSDD states that a first-seller approach would be more complex to administer than a load-based model because California would be responsible for regulating more entities.<sup>3</sup> MSCG does not challenge the statement that more entities would be regulated, but believes there are other reasons why a load-based approach would be more administratively complex than a first-seller system. For example, under a load-based paradigm, California would have to address which entities are responsible for emissions allocations and submissions arising from the CAISO’s dispatch decisions. This issue disappears

---

<sup>3</sup> See FSDD at 4-5.



under a source-based or first-seller paradigm. The FSDD fails to weigh these competing issues when reaching a conclusion as to the “net” complexity of one approach versus the other.

The FSDD also fails to discuss the possibility that the different approaches may shift complexity from one entity to another, rather than eliminate the problem in its entirety. For example, under a load-based approach, a load-serving entity would gather and track emissions data from its supply sources rather than having a regulatory body track emissions directly from first-sellers, but the administrative burden associated with a tracking requirement would still exist as part of California’s GHG program as a whole. Thus, MSCG does not believe the evidence presented in the FSDD supports a conclusion that the net administrative complexity of the first-seller approach is higher than the load-based approach.

**3. Source-based for In-state Generation, Load-based for Imports**

**Q16. Please describe in detail your view of how this option would work.**

No response provided.

**Q17. Do you support such an approach? Why or why not?**

No response provided.

**Q18. Does this approach have legal issues associated with it? Provide a detailed analysis and legal citations.**

No response provided.

**Q19. If retail providers are responsible for internalizing the cost of carbon for imported power, all power generated in-state may need to be tracked to load to avoid double regulation of in-state power. Do you agree?**

No response provided.

**Q20. If that is the case, does a mixed source-based/load-based approach offer any advantages compared to a load-based approach in terms of simplifying reporting and tracking? What if the load-based system uses TEACs? How could imports be differentiated from in-state generation in a way that reduces the complexity of reporting and tracking compared to a load-based approach?**

No response provided.

**4. Deferral of a Market-based Cap-and-Trade System**

**Q21. How important is it that a cap-and-trade system be included in the near-term as part of the electricity sector's AB 32 compliance strategy?**

For the reasons stated previously by MSCG throughout this proceeding, MSCG believes a cap-and-trade system is the best approach to GHG reduction. In addition, it is not administratively efficient to implement one system as an interim measure, and to replace it shortly thereafter with another. This is especially true when the initial system would be more complex, and the subsequent system easier, to administer. If the initial stage of the program were simpler, and the end-stage more complex, MSCG might agree that a phase-in is the best approach. However, this does not appear to be the case.

**Q22. Would your answer to Q12 be different if there is no market-based cap-and-trade system? If so, please explain.**

No response provided.

**Q23. Address the following:**

- **How emission reduction obligations could be met if there is no cap-and-trade system for the electricity sector,**
- **How increased programmatic goals would impact rates, and**
- **How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.**

No response provided.

**Q24. How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.**

No response provided.

**Q25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?**

No response provided.

**Q26. What flexible compliance mechanisms could be integrated into a non-market based GHG emission reduction approach?**

No response provided.

**Q27. If a market-based cap-and-trade system is not implemented for the electricity sector in 2012, how would you recommend addressing early actions that entities may have undertaken in anticipation of a market?**

No response provided.

**E. Recommendation and Comparison of Alternatives**

**Q28. Submit your comprehensive proposal for the approach California should utilize regarding the point of regulation and whether California should implement a cap-and-trade program at this time for the electricity sector. If you recommend that another approach be considered besides those detailed above, propose it here. If you recommend one of the above options, give as detailed a discussion as possible of how the approach would work.**

See response to Q29, below.

**Q29. Address and compare how each of the alternatives identified in the above questions, and the proposal you submit in response to the preceding question, would perform relative to each of the principles or objectives listed above and any other principles or objectives you propose. For each alternative, address important tradeoffs among the principles.**

MSCG continues to support in California – as it has in jurisdictions throughout the world – regulation of GHG emissions through a cap-and-trade system. The single most important reason

for this relates to the Commission's first suggested criterion in Section 3.2: minimizing the total cost to society of achieving a given GHG reduction target. The ability of a cap-and-trade system to harness the ingenuity of the market to identify the best ways to meet the goal is paramount.

For the electricity sector, a source-based approach for in-state resources is necessary to ensure that dispatch decisions reflect the price signal for GHG emissions. This, in turn, will provide market participants with incentives to alter behavior. Accordingly, California should distribute allowances through auctions in order to ensure an immediately viable secondary market, to provide clear price signals for both short- and long-term investment decision making, and to ensure that all entities that require allowances have equal opportunities to acquire them at equal prices. Moreover, the State should channel Auction Revenue Rights derived from auctions to individual consumers of all customer classes to offset the costs of emissions reduction.

AB 32 imposed upon California's regulators the Herculean task of requiring the State to account for emissions associated with imports. A "zero sum" regulation is impossible to impose on an open system where not all of the essential components are subject to the same regulatory criteria. The record in this proceeding demonstrates that several administrative approaches are available for California to assign emissions responsibility to imported power. However, each approach is only an administrative approximation and is vulnerable to leakage and contract shuffling. The challenges for dealing with imports are essentially the same for each of the proposed regulatory structures and the flaws of each approach are roughly equivalent. However, the first-seller approach for dealing with imports is the most consistent with a source-based approach for in-state resources, and is therefore superior to the others.

### III. CONCLUSION

MSCG respectfully requests that the two commissions consider the foregoing comments when making their recommendation on the type and point of regulation for the electricity sector to the CARB.

Respectfully submitted,

/s/

Catherine M. Krupka

Adam J. Katz

McDermott Will & Emery LLP

600 Thirteenth Street, NW

Washington, DC 20005

December 3, 2007

*Attorneys for Morgan Stanley Capital Group Inc.*

WDC99 1491608-1.043920.0236

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Comments of Morgan Stanley Capital Group Inc. on the Administrative Law Judges' Ruling Requesting Comments on Type and Point Regulation Issues on all of parties of record in R. 06-04-009 by electronic mail and by U.S. mail to those parties that have not provided an electronic address to the Commission. I also have sent hard copies by overnight mail to the assigned Commissioner, Michael R. Peevy, and the assigned Administrative Law Judges, Charlotte F. TerKeurst, Jonathan Lakritz, and Meg Gottstein.

Moreover, pursuant to the October 15, 2007 Administrative Law Judge's Ruling Requesting Comments and Noticing Workshop on Allowance Allocation Issues issued in R. 06-04-009, I have sent one hard copy of these comments by overnight mail to the California Energy Commission and have sent electronic copies of these comments to [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us) and to [kgriffin@energy.state.ca.us](mailto:kgriffin@energy.state.ca.us).

Dated at Washington, DC, this 3rd day of December, 2007.

\_\_\_\_\_  
/s/

Adam J. Katz

**Service List: R. 06-04-009**

**Parties**

CINDY ADAMS  
COVANTA ENERGY CORPORATION  
40 LANE ROAD  
FAIRFIELD, NJ 07004

STEVEN HUHMAN  
MORGAN STANLEY CAPITAL GROUP INC.  
2000 WESTCHESTER AVENUE  
PURCHASE, NY 10577

KEITH R. MCCREA  
ATTORNEY AT LAW  
SUTHERLAND, ASBILL & BRENNAN, LLP  
1275 PENNSYLVANIA AVE., N.W.  
WASHINGTON, DC 20004-2415

CATHERINE M. KRUPKA  
MCDERMOTT WILL AND EMERY LLP  
600 THIRTEEN STREEET, NW  
WASHINGTON, DC 20005

CATHY S. WOOLLUMS  
MIDAMERICAN ENERGY HOLDINGS COMPANY  
106 EAST SECOND STREET  
DAVENPORT, IA 52801

KEVIN BOUDREAUX  
CALPINE POWER AMERICA-CA, LLC  
717 TEXAS AVENUE, SUITE 1000  
HOUSTON, TX 77002

E.J. WRIGHT  
OCCIDENTAL POWER SERVICES, INC.  
5 GREENWAY PLAZA, SUITE 110  
HOUSTON, TX 77046

TIMOTHY R. ODIL  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
DENVER, CO 80202

JENINE SCHENK  
APS ENERGY SERVICES  
400 E. VAN BUREN STREET, SUITE 750  
PHOENIX, AZ 85004

KELLY BARR  
MANAGER, REGULATORY AFFAIRS & CONTRACTS  
RIVER PROJECT  
PO BOX 52025, PAB 221

STEVEN S. SCHLEIMER  
DIRECTOR, COMPLIANCE & REGULATORY  
BARCLAYS BANK, PLC  
200 PARK AVENUE, FIFTH FLOOR  
NEW YORK, NY 10166

RICK C. NOGER  
PRAXAIR PLAINFIELD, INC.  
2711 CENTERVILLE ROAD, SUITE 400  
WILMINGTON, DE 19808

ADAM J. KATZ  
MCDERMOTT WILL & EMERY LLP  
600 13TH STREET, NW.  
WASHINGTON, DC 20005

KYLE D. BOUDREAUX  
FPL GROUP  
700 UNIVERSE BLVD., JES/JB  
JUNO BEACH, FL 33408

CYNTHIA A. FONNER  
SENIOR COUNSEL  
CONSTELLATION ENERGY GROUP INC  
550 W. WASHINGTON ST, STE 300  
CHICAGO, IL 60661

THOMAS DILL  
PRESIDENT  
LODI GAS STORAGE, L.L.C.  
1021 MAIN ST STE 1500  
HOUSTON, TX 77002-6509

PAUL M. SEBY  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
DENVER, CO 80202

STEPHEN G. KOERNER, ESQ.  
EL PASO CORPORATION  
WESTERN PIPELINES  
2 NORTH NEVADA AVENUE  
COLORADO SPRINGS, CO 80903

JOHN B. WELDON, JR.  
SALMON, LEWIS & WELDON, P.L.C.  
2850 EAST CAMELBACK ROAD, SUITE 200  
PHOENIX, AZ 85016

ROBERT R. TAYLOR  
AGRICULTURAL IMPROVEMENT AND POWER SALT  
1600 NORTH PRIEST DRIVE, PAB221  
TEMPE, AZ 85281

STEVEN S. MICHEL  
WESTERN RESOURCE ADVOCATES  
2025 SENDA DE ANDRES  
SANTA FE, NM 87501

ROGER C. MONTGOMERY  
VICE PRESIDENT, PRICING  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

LORRAINE PASKETT  
DIRECTOR, LEGISLATIVE AND REG. AFFAIRS  
LA DEPT. OF WATER & POWER  
PO BOX 51111  
111 N. HOWARD ST., ROOM 1536  
LOS ANGELES, CA 90012

RONALD F. DEATON  
LOS ANGELES DEPARTMENT OF WATER  
111 NORTH HOPE STREET, ROOM 1550  
LOS ANGELES, CA 90012

SID NEWSOM  
TARIFF MANAGER  
SOUTHERN CALIFORNIA GAS COMPANY  
GT 14 D6  
555 WEST 5TH STREET  
LOS ANGELES, CA 90051

DAVID L. HUARD  
ATTORNEY AT LAW  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064

CURTIS L. KEBLER  
J. ARON & COMPANY  
SUITE 2600  
AVENUE OF THE STARS  
LOS ANGELES, CA 90067

DENNIS M.P. EHLING  
ATTORNEY AT LAW  
KIRKPATRICK & LOCKHART NICHOLSON 2121  
10100 SANTA MONICA BLVD., 7TH FLOOR  
LOS ANGELES, CA 90067

GREGORY KOISER  
CONSTELLATION NEW ENERGY, INC.  
350 SOUTH GRAND AVENUE, SUITE 3800  
LOS ANGELES, CA 90071

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, NO. 1500  
LOS ANGELES, CA 90071

MICHAEL MAZUR  
CHIEF TECHNICAL OFFICER  
3 PHASES RENEWABLES, LLC  
2100 SEPULVEDA BLVD., SUITE 37  
MANHATTAN BEACH, CA 90266

VITALY LEE  
AES ALAMITOS, LLC  
690 N. STUDEBAKER ROAD  
LONG BEACH, CA 90803

TIFFANY RAU  
POLICY AND COMMUNICATIONS MANAGER  
CARSON HYDROGEN POWER PROJECT LLC  
ONE WORLD TRADE CENTER, SUITE 1600  
LONG BEACH, CA 90831-1600

GREGORY KLATT  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
411 E. HUNTINGTON DRIVE, STE. 107-356  
ARCADIA, CA 91006

RICHARD HELGESON  
SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY  
225 S. LAKE AVE., SUITE 1250  
PASADENA, CA 91101

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367

PAUL DELANEY  
AMERICAN UTILITY NETWORK (A.U.N.)  
10705 DEER CANYON DRIVE  
ALTA LOMA, CA 91737

BARRY R. WALLERSTEIN  
EXECUTIVE OFFICER  
SOUTH COAST AQMD  
21865 COPLEY DRIVE  
DIAMOND BAR, CA 91765-4182



AKBAR JAZAYEIRI  
DIRECTOR OF REVENUE & TARRIFFS  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. ROOM 390  
ROSEMEAD, CA 91770

CATHY A. KARLSTAD  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770

RONALD MOORE  
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC  
630 EAST FOOTHILL BOULEVARD  
SAN DIMAS, CA 91773

AIMEE M. SMITH  
ATTORNEY AT LAW  
SEMPRA ENERGY  
101 ASH STREET HQ13  
SAN DIEGO, CA 92101

ALVIN PAK  
SEMPRA GLOBAL ENTERPRISES  
101 ASH STREET  
SAN DIEGO, CA 92101

DANIEL A. KING  
SEMPRA ENERGY  
101 ASH STREET, HQ 12  
SAN DIEGO, CA 92101

THEODORE ROBERTS  
ATTORNEY AT LAW  
SEMPRA GLOBAL  
101 ASH STREET, HQ 13D  
SAN DIEGO, CA 92101-3017

MARCIE MILNER  
DIRECTOR - REGULATORY AFFAIRS  
SHELL TRADING GAS & POWER COMPANY  
4445 EASTGATE MALL, SUITE 100  
SAN DIEGO, CA 92121

THOMAS DARTON  
PILOT POWER GROUP, INC.  
SUITE 520  
8910 UNIVERSITY CENTER LANE  
SAN DIEGO, CA 92122

GLORIA BRITTON  
ANZA ELECTRIC COOPERATIVE, INC.  
58470 HWY 371  
PO BOX 391909  
ANZA, CA 92539

ANNETTE GILLIAM  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

LAURA I. GENAO  
ATTORNEY  
SOUTHERN CALIFORNIA EDISON  
PO BOX 800  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

DON WOOD  
PACIFIC ENERGY POLICY CENTER  
4539 LEE AVENUE  
LA MESA, CA 91941

ALLEN K. TRIAL  
SAN DIEGO GAS & ELECTRIC COMPANY  
HQ-13  
101 ASH STREET  
SAN DIEGO, CA 92101

DAN HECHT  
SEMPRA ENERGY  
101 ASH STREET  
SAN DIEGO, CA 92101

SYMONE VONGDEUANE  
SEMPRA ENERGY SOLUTIONS  
101 ASH STREET, HQ09  
SAN DIEGO, CA 92101-3017

DONALD C. LIDDELL, P.C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103

REID A. WINTHROP  
PILOT POWER GROUP, INC.  
8910 UNIVERSITY CENTER LANE, SUITE 520  
SAN DIEGO, CA 92122

STEVE RAHON  
DIRECTOR, TARIFF & REGULATORY ACCOUNTS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548

LYNELLE LUND  
COMMERCE ENERGY, INC.  
600 ANTON BLVD., SUITE 2000  
COSTA MESA, CA 92626

TAMLYN M. HUNT  
ENERGY PROGRAM DIRECTOR  
COMMUNITY ENVIRONMENTAL COUNCIL  
26 W. ANAPAMU ST., 2ND FLOOR  
SANTA BARBARA, CA 93101

JOHN P. HUGHES  
MANAGER, REGULATORY AFFAIRS  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, STE. 2040  
SAN FRANCISCO, CA 94102

MARCEL HAWIGER  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

DIANA L. LEE  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4300  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

AUDREY CHANG  
STAFF SCIENTIST  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

EVELYN KAHL  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

MICHAEL P. ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

WILLIAM H. CHEN  
DIRECTOR, ENERGY POLICY WEST REGION  
CONSTELLATION NEW ENERGY, INC.  
SPEAR TOWER, 36TH FLOOR  
ONE MARKET STREET  
SAN FRANCISCO, CA 94105

EDWARD G POOLE  
ANDERSON DONOVAN & POOLE  
601 CALIFORNIA STREET SUITE 1300  
SAN FRANCISCO, CA 94108

JEANNE M. SOLE  
DEPUTY CITY ATTORNEY  
CITY AND COUNTY OF SAN FRANCISCO  
1 DR. CARLTON B. GOODLETT PLACE, RM. 234  
SAN FRANCISCO, CA 94102

LAD LORENZ  
V.P. REGULATORY AFFAIRS  
SEMPRA UTILITIES  
601 VAN NESS AVENUE, SUITE 2060  
SAN FRANCISCO, CA 94102

NINA SUETAKE  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVE., STE. 350  
SAN FRANCISCO, CA 94102

F. JACKSON STODDARD  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5125  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DONALD BROOKHYSER  
ATTORNEY AT LAW  
ALCANTAR & KAHL  
120 MONTGOMERY STREET  
SAN FRANCISCO, CA 94104

KRISTIN GRENFELL  
PROJECT ATTORNEY, CALIF. ENERGY PROGRAM  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

SEEMA SRINIVASAN  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

BRIAN K. CHERRY  
DIRECTOR REGULATORY RELATIONS  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B10C  
SAN FRANCISCO, CA 94106

ANN G. GRIMALDI  
MCKENNA LONG & ALDRIDGE LLP  
101 CALIFORNIA STREET, 41ST FLOOR  
SAN FRANCISCO, CA 94111

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

JEANNE B. ARMSTRONG  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

LISA A. COTTLE  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET, 39TH FLOOR  
SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN  
GOODIN, MACBRIDE, SQUERI, DAY, LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

JEFFREY P. GRAY  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533

SARA STECK MYERS  
ATTORNEY AT LAW  
122 28TH AVENUE  
SAN FRANCISCO, CA 94121

ANDREW L. HARRIS  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

JENNIFER CHAMBERLIN  
STRATEGIC ENERGY, LLC  
2633 WELLINGTON CT.  
CLYDE, CA 94520

KERRY HATTEVIK  
MIRANT CORPORATION  
696 WEST 10TH STREET  
PITTSBURG, CA 94565

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
1500 NEWELL AVENUE, 5TH FLOOR  
WALNUT CREEK, CA 94596

JAMES D. SQUERI  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP  
505 SANSOME STREET, STE 900  
SAN FRANCISCO, CA 94111

KAREN BOWEN  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111

SEAN P. BEATTY  
ATTORNEY AT LAW  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA ST., 17TH FLOOR  
SAN FRANCISCO, CA 94111

JOSEPH M. KARP  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111-5802

CHRISTOPHER J. WARNER  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, PO BOX 7442  
SAN FRANCISCO, CA 94120-7442

LARS KVALE  
CENTER FOR RESOURCE SOLUTIONS  
PRESIDIO BUILDING 97  
PO BOX 39512  
SAN FRANCISCO, CA 94129

ANDREA WELLER  
STRATEGIC ENERGY  
3130 D BALFOUR RD., SUITE 290  
BRENTWOOD, CA 94513

BETH VAUGHAN  
CALIFORNIA COGENERATION COUNCIL  
4391 N. MARSH ELDER COURT  
CONCORD, CA 94521

AVIS KOWALEWSKI  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588

J. ANDREW HOERNER  
REDEFINING PROGRESS  
1904 FRANKLIN STREET  
OAKLAND, CA 94612

JANILL RICHARDS  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
1515 CLAY STREET, 20TH FLOOR  
OAKLAND, CA 94702

GREGG MORRIS  
DIRECTOR  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVENUE, STE 402  
BERKELEY, CA 94704

KENNETH C. JOHNSON  
KENNETH CARLISLE JOHNSON  
2502 ROBERTSON RD  
SANTA CLARA, CA 95051

C. SUSIE BERLIN  
ATTORNEY AT LAW  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

JOY A. WARREN  
REGULATORY ADMINISTRATOR  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

JOHN JENSEN  
PRESIDENT  
MOUNTAIN UTILITIES  
PO BOX 205  
KIRKWOOD, CA 95646

LEONARD DEVANNA  
EXECUTIVE VICE PRESIDENT  
CLEAN ENERGY SYSTEMS, INC.  
11330 SUNCO DRIVE, SUITE A  
RANCHO CORDOVA, CA 95742

BRUCE MCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

JANE E. LUCKHARDT  
ATTORNEY AT LAW  
DOWNEY BRAND LLP  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814

CLIFF CHEN  
UNION OF CONCERNED SCIENTIST  
2397 SHATTUCK AVENUE, STE 203  
BERKELEY, CA 94704

R. THOMAS BEACH  
CROSSBORDER ENERGY  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710-2557

BARRY F. MCCARTHY  
ATTORNEY AT LAW  
MCCARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

MIKE LAMOND  
ALPINE NATURAL GAS OPERATING CO. #1 LLC  
PO BOX 550  
VALLEY SPRINGS, CA 95252

UDI HELMAN  
CALIFORNIA INDEPENDENT SYS. OPER. CORP  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MARY LYNCH  
VP - REGULATORY AND LEGISLATIVE AFFAIRS  
CONSTELLATION ENERGY COMMODITIES GROUP  
2377 GOLD MEDAL WAY, SUITE 100  
GOLD RIVER, CA 95670

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95811

GREGGORY L. WHEATLAND  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

JEFFERY D. HARRIS  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS LLP  
2015 H STREET  
SACRAMENTO, CA 95814

VIRGIL WELCH  
STAFF ATTORNEY  
ENVIRONMENTAL DEFENSE  
1107 9TH STREET, SUITE 540  
SACRAMENTO, CA 95814

DOWNEY BRAND  
DOWNEY BRAND  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814-4686

STEVEN M. COHN  
ASSISTANT GENERAL COUNSEL  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
PO BOX 15830  
SACRAMENTO, CA 95852-1830

DAN SILVERIA  
SURPRISE VALLEY ELECTRIC CORPORATION  
PO BOX 691  
ALTURAS, CA 96101

DONALD BROOKHYSER  
ALCANTAR & KAHL  
1300 SW FIFTH AVE., SUITE 1750  
PORTLAND, OR 97210

KYLE L. DAVIS  
PACIFICORP  
825 NE MULTNOMAH ST., SUITE 2000  
PORTLAND, OR 97232

IAN CARTER  
POLICY COORDINATOR-NORTH AMERICA  
INTERNATIONAL EMISSIONS TRADING ASSN.  
350 SPARKS STREET, STE. 809  
OTTAWA, ON K1R 7S8  
CANADA

WILLIAM W. WESTERFIELD, 111  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2015 H STREET  
SACRAMENTO, CA 95814

RAYMOND J. CZAHAR, C.P.A.  
CHIEF FINANCIAL OFFICER  
WEST COAST GAS COMPANY  
9203 BEATTY DRIVE  
SACRAMENTO, CA 95826

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER & MURPHY, LLP  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864

JESSICA NELSON  
PLUMAS-SIERRA RURAL ELECTRIC CO-OP  
73233 STATE ROUTE 70, STE A  
PORTOLA, CA 96122-7064

CYNTHIA SCHULTZ  
REGULATORY FILING COORDINATOR  
PACIFIC POWER AND LIGHT COMPANY  
825 N.E. MULTNOMAH  
PORTLAND, OR 97232

RYAN FLYNN  
PACIFICORP  
825 NE MULTNOMAH STREET, 18TH FLOOR  
PORTLAND, OR 97232

JASON DUBCHAK  
ASSOCIATE GENERAL COUNSEL  
WILD GOOSE STORAGE LLC  
C/O NISKA GAS STORAGE, SUITE 400  
607 8TH AVENUE S.W.  
CALGARY, AB T2P 0A7  
CANADA

## Information Only

BRIAN M. JONES  
M. J. BRADLEY & ASSOCIATES, INC.  
47 JUNCTION SQUARE DRIVE  
CONCORD, MA 01742

KENNETH A. COLBURN  
SYMBILTIC STRATEGIES, LLC  
26 WINTON ROAD  
MEREDITH, NH 03253

MATTHEW MOST  
EDISON MISSION MARKETING & TRADING, INC.  
160 FEDERAL STREET  
BOSTON, MA 02110-1776

RICHARD COWART  
REGULATORY ASSISTANCE PROJECT  
50 STATE STREET, SUITE 3  
MONTPELIER, VT 05602

KATHRYN WIG  
PARALEGAL  
NRG ENERGY, INC.  
211 CARNEGIE CENTER  
PRINCETON, NY 08540

GEORGE HOPLEY  
BARCLAYS CAPITAL  
200 PARK AVENUE  
NEW YORK, NY 10166

DALLAS BURTRAW  
1616 P STREET, NW  
WASHINGTON, DC 20036

ANDREW BRADFORD  
SENIOR MARKET RESEARCH ASSOCIATE  
FELLON-MCCORD & ASSOCIATES  
SUITE 2000  
9960 CORPORATE CAMPUS DRIVE  
LOUISVILLE, KY 40223

RALPH E. DENNIS  
DIRECTOR, REGULATORY AFFAIRS  
FELLON-MCCORD & ASSOCIATES  
CONSTELLATION NEWENERGY-GAS DIVISION  
9960 CORPORATE CAMPUS DRIVE, STE 2000  
LOUISVILLE, KY 40223

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI 48170

JAMES W. KEATING  
BP AMERICA, INC.  
MAIL CODE 603-1E  
150 W. WARRENVILLE RD.  
NAPERVILLE, IL 60563

TRENT A. CARLSON  
RELIANT ENERGY  
1000 MAIN STREET  
HOUSTON, TX 77001

JEANNE ZAIONTZ  
BP ENERGY COMPANY  
501 WESTLAKE PARK BLVD, RM. 4328  
HOUSTON, TX 77079

SAKIS ASTERIADIS  
APX INC  
1270 FIFTH AVE., SUITE 15R  
NEW YORK, NY 10029

ELIZABETH ZELLJADT  
1725 I STREET, N.W. SUITE 300  
WASHINGTON, DC 20006

VERONIQUE BUGNION  
POINT CARBON  
205 SEVERN RIVER RD  
SEVERNA PARK, MD 21146

GARY BARCH  
FELLON-MCCORD & ASSOCIATES, INC.  
SUITE 2000  
9960 CORPORATE CAMPUS DRIVE  
LOUISVILLE, KY 40223

SAMARA MINDEL  
REGULATORY AFFAIRS ANALYST  
FELLON-MCCORD & ASSOCIATES  
9960 CORPORATE CAMPUS DRIVE, SUITE 2000  
LOUISVILLE, KY 40223

BRIAN POTTS  
FOLEY & LARDNER  
PO BOX 1497  
150 EAST GILMAN STREET  
MADISON, WI 53701-1497

JAMES ROSS  
RCS, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017

GARY HINNERS  
RELIANT ENERGY, INC.  
PO BOX 148  
HOUSTON, TX 77001-0148

JULIE L. MARTIN  
WEST ISO COORDINATOR  
NORTH AMERICA GAS AND POWER  
BP ENERGY COMPANY  
501 WESTLAKE PARK BLVD.  
HOUSTON, TX 77079

FIJI GEORGE  
EL PASO CORPORATION  
EL PASO BUILDING  
PO BOX 2511  
HOUSTON, TX 77252

FRANK STERN  
SUMMIT BLUE CONSULTING  
1722 14TH STREET, SUITE 230  
BOULDER, CO 80302

NICHOLAS LENSSEN  
ENERGY INSIGHTS  
1750 14TH STREET, SUITE 200  
BOULDER, CO 80302

WAYNE TOMLINSON  
EL PASO CORPORATION  
WESTERN PIPELINES  
2 NORTH NEVADA AVENUE  
COLORADO SPRINGS, CO 80903

SANDRA ELY  
NEW MEXICO ENVIRONMENT DEPARTMENT  
1190 ST FRANCIS DRIVE  
SANTA FE, NM 87501

DOUGLAS BROOKS  
NEVADA POWER COMPANY  
SIERRA PACIFIC POWER COMPANY  
6226 WEST SAHARA AVENUE  
LAS VEGAS, NV 89151

RANDY SABLE  
SOUTHWEST GAS CORPORATION  
MAILSTOP: LVB-105  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89193

JJ PRUCNAL  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

CYNTHIA MITCHELL  
ENERGY ECONOMICS, INC.  
530 COLGATE COURT  
RENO, NV 89503

ELENA MELLO  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89520

ED CHIANG  
ELEMENT MARKETS, LLC  
ONE SUGAR CREEK CENTER BLVD., SUITE 250  
SUGAR LAND, TX 77478

NADAV ENBAR  
ENERGY INSIGHTS  
1750 14TH STREET, SUITE 200  
BOULDER, CO 80302

ELIZABETH BAKER  
SUMMIT BLUE CONSULTING  
1722 14TH STREET, SUITE 230  
BOULDER, CO 80304

KEVIN J. SIMONSEN  
ENERGY MANAGEMENT SERVICES  
646 EAST THIRD AVENUE  
DURANGO, CO 81301

BRIAN MCQUOWN  
RELIANT ENERGY  
7251 AMIGO ST., SUITE 120  
LAS VEGAS, NV 89119

ANITA HART  
SENIOR SPECIALIST/STATE REGULATORYAFFAIR  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89193

BILL SCHRAND  
SOUTHWEST GAS CORPORATON  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

SANDRA CAROLINA  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

CHRISTOPHER A. HILEN  
ASSISTANT GENERAL COUNSEL  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89511

TREVOR DILLARD  
SIERRA PACIFIC POWER COMPANY  
PO BOX 10100  
6100 NEIL ROAD, MS S4A50  
RENO, NV 89520

DARRELL SOYARS  
MANAGER-RESOURCE PERMITTING&STRATEGIC  
SIERRA PACIFIC RESOURCES  
6100 NEIL ROAD  
RENO, NV 89520-0024

LEILANI JOHNSON KOWAL  
LOS ANGELES DEPT. OF WATER AND POWER  
111 N. HOPE STREET, ROOM 1050  
LOS ANGELES, CA 90012

ROBERT K. ROZANSKI  
LOS ANGELES DEPT OF WATER AND POWER  
111 NORTH HOPE STREET, ROOM 1520  
LOS ANGELES, CA 90012

HUGH YAO  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. 5TH ST, GT22G2  
LOS ANGELES, CA 90013

RANDALL W. KEEN  
ATTORNEY AT LAW  
MANATT PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064

PETER JAZAYERI  
STROOCK & STROOCK & LAVAN LLP  
2029 CENTURY PARK EAST, SUITE 1800  
LOS ANGELES, CA 90067

DAVID NEMTZOW  
1254 9TH STREET, NO. 6  
SANTA MONICA, CA 90401

STEVE ENDO  
PASADENA DEPARTMENT OF WATER & POWER  
45 EAST GLENARM STREET  
PASADENA, CA 91105

TOM HAMILTON  
MANAGING PARTNER  
ENERGY CONCIERGE SERVICES  
321 MESA LILA RD  
GLENDALE, CA 91208

RICHARD J. MORILLO  
ASSISTANT CITY ATTORNEY  
CITY OF BURBANK  
215 E. OLIVE AVENUE  
BURBANK, CA 91502

JOSEPH GRECO  
VICE PRESIDENT - WESTERN REGION  
CAITHNESS ENERGY, LLC.  
9590 PROTOTYPE COURT, SUITE 200  
RENO, NV 89521

RANDY S. HOWARD  
LOS ANGELES DEPT. OF WATER AND POWER  
111 NORTH HOPE STREET, ROOM 921  
LOS ANGELES, CA 90012

ROBERT L. PETTINATO  
LOS ANGELES DEPARTMENT OF WATER & POWER  
111 NORTH HOPE STREET, SUITE 1151  
LOS ANGELES, CA 90012

RASHA PRINCE  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST 5TH STREET, GT14D6  
LOS ANGELES, CA 90013

S. NANCY WHANG  
ATTORNEY AT LAW  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064

DEREK MARKOLF  
CALIFORNIA CLIMATE ACTION REGISTRY  
515 S. FLOWER STREET, SUITE 1640  
LOS ANGELES, CA 90071

HARVEY EDER  
PUBLIC SOLAR POWER COALITION  
1218 12TH ST., 25  
SANTA MONICA, CA 90401

STEVEN G. LINS  
GENERAL COUNSEL  
GLENDALE WATER AND POWER  
613 EAST BROADWAY, SUITE 220  
GLENDALE, CA 91206-4394

BRUNO JEIDER  
BURBANK WATER & POWER  
164 WEST MAGNOLIA BLVD.  
BURBANK, CA 91502

ROGER PELOTE  
WILLIAMS POWER COMPANY  
12736 CALIFA STREET  
VALLEY VILLAGE, CA 91607



AIMEE BARNES  
MANAGER REGULATORY AFFAIRS  
ECOSECURITIES  
206 W. BONITA AVENUE  
CLAREMONT, CA 91711

TIM HEMIG  
NRG ENERGY, INC.  
1819 ASTON AVENUE, SUITE 105  
CARLSBAD, CA 92008

ALDYN HOEKSTRA  
PACE GLOBAL ENERGY SERVICES  
420 WEST BROADWAY, 4TH FLOOR  
SAN DIEGO, CA 92101

JOHN LAUN  
APOGEE INTERACTIVE, INC.  
1220 ROSECRANS ST., SUITE 308  
SAN DIEGO, CA 92106

SCOTT J. ANDERS  
RESEARCH/ADMINISTRATIVE DIRECTOR  
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110

ANDREW MCALLISTER  
DIRECTOR OF OPERATIONS  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVE., SUITE 100  
SAN DIEGO, CA 92123

JENNIFER PORTER  
POLICY ANALYST  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVENUE, SUITE 100  
SAN DIEGO, CA 92123

DESPINA NIEHAUS  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32H  
SAN DIEGO, CA 92123-1530

ORLANDO B. FOOTE, III  
ATTORNEY AT LAW  
HORTON, KNOX, CARTER & FOOTE  
895 BROADWAY, SUITE 101  
EL CENTRO, CA 92243

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE., RM. 370  
ROSEMEAD, CA 91770

BARRY LOVELL  
15708 POMERADO RD., SUITE 203  
POWAY, CA 92064

YVONNE GROSS  
REGULATORY POLICY MANAGER  
SEMPRA ENERGY  
HQ08C  
101 ASH STREET  
SAN DIEGO, CA 92103

KIM KIENER  
504 CATALINA BLVD.  
SAN DIEGO, CA 92106

JOSEPH R. KLOBERDANZ  
SAN DIEGO GAS & ELECTRIC  
PO BOX 1831  
SAN DIEGO, CA 92112

JACK BURKE  
LEGISLATIVE AFFAIRS MANAGER  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVE., SUITE 100  
SAN DIEGO, CA 92123

SEPHRA A. NINOW  
POLICY ANALYST  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVENUE, SUITE 100  
SAN DIEGO, CA 92123

JOHN W. LESLIE  
ATTORNEY AT LAW  
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130

ELSTON K. GRUBAUGH  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BLVD.  
IMPERIAL, CA 92251

THOMAS MCCABE  
EDISON MISSION ENERGY  
18101 VON KARMAN AVE., SUITE 1700  
IRVINE, CA 92612

GLORIA D. SMITH  
ADAMS, BROADWELL, JOSEPH & CARDOZO  
601 GATEWAY BLVD., SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080

DIANE I. FELLMAN  
DIRECTOR, REGULATORY AFFAIRS  
FPL ENERGY PROJECT MANAGEMENT, INC.  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102

MICHEL FLORIO  
ATTORNEYS AT LAW  
711 VAN NESS AVE., STE. 350  
SAN FRANCISCO, CA 94102

MICHAEL A. HYAMS  
POWER ENTERPRISE-REGULATORY AFFAIRS  
SAN FRANCISCO PUBLIC UTILITIES COMM  
1155 MARKET ST., 4TH FLOOR  
SAN FRANCISCO, CA 94103

NORMAN J. FURUTA  
ATTORNEY AT LAW  
FEDERAL EXECUTIVE AGENCIES  
1455 MARKET ST., SUITE 1744  
SAN FRANCISCO, CA 94103-1399

ANNABELLE MALINS  
CONSUL-SCIENCE AND TECHNOLOGY  
BRITISH CONSULATE-GENERAL  
ONE SANSOME STREET, SUITE 850  
SAN FRANCISCO, CA 94104

KAREN TERRANOVA  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, STE 2200  
SAN FRANCISCO, CA 94104

OLOF BYSTROM  
DIRECTOR, WESTERN ENERGY  
CAMBRIDGE ENERGY RESEARCH ASSOCIATES  
555 CALIFORNIA STREET, 3RD FLOOR  
SAN FRANCISCO, CA 94104

JAN PEPPER  
CLEAN POWER MARKETS, INC.  
PO BOX 3206  
418 BENVENUE AVENUE  
LOS ALTOS, CA 94024

MARC D. JOSEPH  
ADAMS BRADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD. STE 1000  
SOUTH SAN FRANCISCO, CA 94080

HAYLEY GOODSON  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

DAN ADLER  
DIRECTOR, TECH AND POLICY DEVELOPMENT  
CALIFORNIA CLEAN ENERGY FUND  
5 THIRD STREET, SUITE 1125  
SAN FRANCISCO, CA 94103

THERESA BURKE  
REGULATORY ANALYST  
SAN FRANCISCO PUC  
1155 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103

AMBER MAHONE  
ENERGY & ENVIRONMENTAL ECONOMICS, INC.  
101 MONTGOMERY STREET, SUITE 1600  
SAN FRANCISCO, CA 94104

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

SETH HILTON  
ATTORNEY AT LAW  
STOEL RIVES  
111 SUTTER ST., SUITE 700  
SAN FRANCISCO, CA 94104

SHERYL CARTER  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

CARMEN E. BASKETTE  
CORPORATE DEVELOPMENT PRINCIPAL  
ENERNOC  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105

JAMES W. TARNAGHAN  
DUANE MORRIS LLP  
SUITE 2000  
ONE MARKET, SPEAR TOWER  
SAN FRANCISCO, CA 94105

KHURSHID KHOJA  
ASSOCIATE  
THELEN REID BROWN RAYSMAN & STEINER  
101 SECOND STREET, SUITE 1800  
SAN FRANCISCO, CA 94105

SHERIDAN J. PAUKER  
WILSON SONSINI GOODRICH & ROSATI  
SPEAR TOWER, SUITE 3300  
ONE MARKET ST  
SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVENUE  
SAN FRANCISCO, CA 94110

JANINE L. SCANCARELLI  
ATTORNEY AT LAW  
FOLGER, LEVIN & KAHN, LLP  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111

MARTIN A. MATTES  
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
50 CALIFORNIA STREET, SUITE 3400  
SAN FRANCISCO, CA 94111

LISA WEINZIMER  
ASSOCIATE EDITOR  
PLATTS MCGRAW-HILL  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118

SHAUN ELLIS  
2183 UNION STREET  
SAN FRANCISCO, CA 94123

ASHLEE M. BONDS  
THELEN REID BROWN RAYSMAN & STEINER LLP  
SUITE 1800  
101 SECOND STREET  
SAN FRANCISCO, CA 94105

COLIN PETHERAM  
DIRECTOR-REGULATORY  
SBC CALIFORNIA  
140 NEW MONTGOMERY ST., SUITE 1325  
SAN FRANCISCO, CA 94105

KEVIN FOX  
WILSON SONSINI GOODRICH & ROSATI  
ONE MARKET STREET, SPEAR TOWER, 3300  
SAN FRANCISCO, CA 94105

PETER V. ALLEN  
THELEN REID BROWN RAYSMAN & STEINER  
101 SECOND STREET, SUITE 1800  
SAN FRANCISCO, CA 94105

ROBERT J. REINHARD  
MORRISON AND FOERSTER  
425 MARKET STREET  
SAN FRANCISCO, CA 94105-2482

HOWARD V. GOLUB  
NIXON PEABODY LLP  
2 EMBARCADERO CENTER, STE. 2700  
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

JEN MCGRAW  
CENTER FOR NEIGHBORHOOD TECHNOLOGY  
PO BOX 14322  
SAN FRANCISCO, CA 94114

STEVEN MOSS  
SAN FRANCISCO COMMUNITY POWER COOP  
2325 3RD STREET, SUITE 344  
SAN FRANCISCO, CA 94120

ARNO HARRIS  
RECURRENT ENERGY, INC.  
220 HALLECK ST., SUITE 220  
SAN FRANCISCO, CA 94129

BIANCA BOWMAN  
RATE CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PG&E MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

GRACE LIVINGSTON-NUNLEY  
ASSISTANT PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

JONATHAN FORRESTER  
PG&E  
MAIL CODE N13C  
PO BOX 770000  
SAN FRANCISCO, CA 94177

SEBASTIEN CSAPO  
PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

STEPHANIE LA SHAWN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177

KARLA DAILEY  
CITY OF PALO ALTO  
UTILITIES DEPARTMENT  
BOX 10250  
PALO ALTO, CA 94303

DEAN R. TIBBS  
PRESIDENT  
ADVANCED ENERGY STRATEGIES, INC.  
1390 WILLOW PASS ROAD, SUITE 610  
CONCORD, CA 94520

ANDREW J. VAN HORN  
VAN HORN CONSULTING  
12 LIND COURT  
ORINDA, CA 94563

SUE KATELEY  
EXECUTIVE DIRECTOR  
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN  
PO BOX 782  
RIO VISTA, CA 94571

ED LUCHA  
CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177

JASMIN ANSAR  
PG&E  
MAIL CODE B24A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

RAYMOND HUNG  
PG&E  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

SOUMYA SASTRY  
PACIFIC GAS AND ELECTRIC COMPANY  
MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

VALERIE J. WINN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, B9A  
SAN FRANCISCO, CA 94177-0001

FARROKH ALBUYEH  
VICE PRESIDENT  
OPEN ACCESS TECHNOLOGY INTERNATIONAL INC  
SUITE 910  
1875 SOUTH GRANT STREET  
SAN MATEO, CA 94402

JEFFREY L. HAHN  
COVANTA ENERGY CORPORATION  
876 MT. VIEW DRIVE  
LAFAYETTE, CA 94549

JOSEPH M. PAUL  
SENIOR CORPORATE COUNSEL  
DYNEGY, INC.  
4140 DUBLIN BLVD., STE. 100  
DUBLIN, CA 94568

GREG BLUE  
ENXCO DEVELOPMENT CORP  
5000 EXECUTIVE PARKWAY, STE.140  
SAN RAMON, CA 94583

SARAH BESERRA  
CALIFORNIA REPORTS  
39 CASTLE HILL COURT  
VALLEJO, CA 94591

PETER W. HANSCHEN  
ATTORNEY AT LAW  
MORRISON & FOERSTER, LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94596

PATRICIA THOMPSON  
SUMMIT BLUE CONSULTING  
2920 CAMINO DIABLO, SUITE 210  
WALNUT CREEK, CA 94597

BETTY SETO  
POLICY ANALYST  
KEMA, INC.  
492 NINTH STREET, SUITE 220  
OAKLAND, CA 94607

JODY S. LONDON  
JODY LONDON CONSULTING  
PO BOX 3629  
OAKLAND, CA 94609

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612

ADAM BRIONES  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704

CLYDE MURLEY  
1031 ORDWAY STREET  
ALBANY, CA 94706

CARLA PETERMAN  
UCEI  
2547 CHANNING WAY  
BERKELEY, CA 94720

RYAN WISER  
BERKELEY LAB  
MS-90-4000  
ONE CYCLOTRON ROAD  
BERKELEY, CA 94720

MONICA A. SCHWEBS, ESQ.  
BINGHAM MCCUTCHEN LLP  
PO BOX V  
1333 N. CALIFORNIA BLVD., SUITE 210  
WALNUT CREEK, CA 94596

JOSEPH HENRI  
31 MIRAMONTE ROAD  
WALNUT CREEK, CA 94597

WILLIAM F. DIETRICH  
ATTORNEY AT LAW  
DIETRICH LAW  
2977 YGNACIO VALLEY ROAD, 613  
WALNUT CREEK, CA 94598-3535

GERALD L. LAHR  
ABAG POWER  
101 EIGHTH STREET  
OAKLAND, CA 94607

STEVEN SCHILLER  
SCHILLER CONSULTING, INC.  
111 HILLSIDE AVENUE  
PIEDMONT, CA 94611

REED V. SCHMIDT  
VICE PRESIDENT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703

STEVE KROMER  
3110 COLLEGE AVENUE, APT 12  
BERKELEY, CA 94705

BRENDA LEMAY  
DIRECTOR OF PROJECT DEVELOPMENT  
HORIZON WIND ENERGY  
1600 SHATTUCK, SUITE 222  
BERKELEY, CA 94709

EDWARD VINE  
LAWRENCE BERKELEY NATIONAL LABORATORY  
BUILDING 90R4000  
BERKELEY, CA 94720

CHRIS MARNAY  
BERKELEY LAB  
1 CYCLOTRON RD MS 90R4000  
BERKELEY, CA 94720-8136

PHILLIP J. MULLER  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

CARL PECHMAN  
POWER ECONOMICS  
901 CENTER STREET  
SANTA CRUZ, CA 95060

RICHARD SMITH  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95352-4060

THOMAS S. KIMBALL  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460

CLARK BERNIER  
RLW ANALYTICS  
1055 BROADWAY, SUITE G  
SONOMA, CA 95476

CAROLYN M. KEHREIN  
ENERGY MANAGEMENT SERVICES  
1505 DUNLAP COURT  
DIXON, CA 95620-4208

GRANT ROSENBLUM, ESQ.  
CALIFORNIA ISO  
LEGAL AND REGULATORY DEPARTMENT  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

ROBIN SMUTNY-JONES  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

DAVID BRANCHCOMB  
BRANCHCOMB ASSOCIATES, LLC  
9360 OAKTREE LANE  
ORANGEVILLE, CA 95662

KIRBY DUSEL  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670

RITA NORTON  
RITA NORTON AND ASSOCIATES, LLC  
18700 BLYTHSWOOD DRIVE,  
LOS GATOS, CA 95030

MAHLON ALDRIDGE  
ECOLOGY ACTION  
PO BOX 1188  
SANTA CRUZ, CA 95060

ROGER VAN HOY  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

WES MONIER  
STRATEGIC ISSUES AND PLANNING MANAGER  
TURLOCK IRRIGATION DISTRICT  
333 EAST CANAL DRIVE, PO BOX 949  
TURLOCK, CA 95381-0949

JOHN R. REDDING  
ARCTURUS ENERGY CONSULTING  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460

RICHARD MCCANN, PH.D  
M. CUBED  
2655 PORTAGE BAY, SUITE 3  
DAVIS, CA 95616

CALIFORNIA ISO  
LEGAL AND REGULATORY DEPARTMENT  
151 BLUE RAVINE ROAD

KAREN EDSON  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

SAEED FARROKHPAY  
FEDERAL ENERGY REGULATORY COMMISSION  
110 BLUE RAVINE RD., SUITE 107  
FOLSOM, CA 95630

KENNY SWAIN  
NAVIGANT CONSULTING  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670

GORDON PICKERING  
PRINCIPAL  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078

LAURIE PARK  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078

SCOTT TOMASHEFSKY  
NORTHERN CALIFORNIA POWER AGENCY  
180 CIRBY WAY  
ROSEVILLE, CA 95678-6420

AUDRA HARTMANN  
DYNEGY INC.  
980 NINTH STREET, SUITE 1420  
SACRAMENTO, CA 95814

CURT BARRY  
717 K STREET, SUITE 503  
SACRAMENTO, CA 95814

DANIELLE MATTHEWS SEPERAS  
CALPINE CORPORATION  
1127 11TH STREET, SUITE 242  
SACRAMENTO, CA 95814

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

KASSANDRA GOUGH  
CALPINE CORPORATION  
1127 11TH STREET, SUITE 242  
SACRAMENTO, CA 95814

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814

PANAMA BARTHOLOMY  
ADVISOR TO CHAIR PFANNENSTIEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET  
SACRAMENTO, CA 95814

RACHEL MCMAHON  
CEERT  
1100 11TH STREET, SUITE 311  
SACRAMENTO, CA 95814

DAVID REYNOLDS  
MEMBER SERVICES MANAGER  
NORTHERN CALIFORNIA POWER AGENCY  
180 CIRBY WAY  
ROSEVILLE, CA 95678-6420

ELLEN WOLFE  
RESERO CONSULTING  
9289 SHADOW BROOK PL.  
GRANITE BAY, CA 95746

BOB LUCAS  
LUCAS ADVOCATES  
1121 L STREET, SUITE 407  
SACRAMENTO, CA 95814

DAN SKOPEC  
CLIMATE & ENERGY CONSULTING  
1201 K STREET SUITE 970  
SACRAMENTO, CA 95814

DAVID L. MODISETTE  
EXECUTIVE DIRECTOR  
CALIFORNIA ELECTRIC TRANSP. COALITION  
1015 K STREET, SUITE 200  
SACRAMENTO, CA 95814

JUSTIN C. WYNNE  
BRAU & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

KELLIE SMITH  
SENATE ENERGY/UTILITIES & COMMUNICATION  
STATE CAPITOL, ROOM 4038  
SACRAMENTO, CA 95814

MICHAEL WAUGH  
AIR RESOURCES BOARD  
1001 10TH STREET  
SACRAMENTO, CA 95814

PATRICK STONER  
PROGRAM DIRECTOR  
LOCAL GOVERNMENT COMMISSION  
1303 J STREET, SUITE 250  
SACRAMENTO, CA 95814

RYAN BERNARDO  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

STEVEN A. LIPMAN  
STEVEN LIPMAN CONSULTING  
500 N. STREET 1108  
SACRAMENTO, CA 95814

WEBSTER TASAT  
AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

LAURIE TEN HOPE  
ADVISOR TO COMMISSIONER BYRON  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-32  
SACRAMENTO, CA 95814-5512

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95816

BUD BEEBE  
SACRAMENTO MUNICIPAL UTIL DIST  
MS B257  
6201 S STREET  
SACRAMENTO, CA 95817-1899

DOUGLAS MACMULLLEN  
CHIEF, POWER PLANNING SECTION  
CA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVE., ROOM 356  
SACRAMENTO, CA 95821

KAREN LINDH  
LINDH & ASSOCIATES  
7909 WALERGA ROAD, NO. 112, PMB 119  
ANTELOPE, CA 95843

ANNE-MARIE MADISON  
TRANSALTA ENERGY MARKETING INC.  
222 SW COLUMBIA STREET, STE 1105  
PORTLAND, OR 97201

ELIZABETH WESTBY  
ALCANTAR & KAHL, LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND, OR 97201

ALAN COMNES  
WEST COAST POWER  
3934 SE ASH STREET  
PORTLAND, OR 97214

STEVEN KELLY  
INDEPENDENT ENERGY PRODUCERS  
1215 K STREET, SUITE 900  
SACRAMENTO, CA 95814

EDWARD J. TIEDEMANN  
ATTORNEY AT LAW  
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
400 CAPITOL MALL, 27TH FLOOR  
SACRAMENTO, CA 95814-4416

JOSHUA BUSHINSKY  
WESTERN POLICY COORDINATOR  
PEW CENTER ON GLOBAL CLIMATE CHANGE  
2101 WILSON BLVD., SUITE 550  
ARLINGTON, VA 95816

OBADIAH BARTHOLOMY  
MECHANICAL ENGINEER  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
M.S. B257  
6201 S. STREET  
SACRAMENTO, CA 95817

BALWANT S. PUREWAL  
DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVE., LL-90  
SACRAMENTO, CA 95821

KAREN NORENE MILLS  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833

ELIZABETH W. HADLEY  
CITY OF REDDING  
777 CYPRESS AVENUE  
REDDING, CA 96001

ANNIE STANGE  
ALCANTAR & KAHL  
1300 SW FIFTH AVE., SUITE 1750  
PORTLAND, OR 97201

ALEXIA C. KELLY  
THE CLIMATE TRUST  
65 SW YAMHILL STREET, SUITE 400  
PORTLAND, OR 97204

KYLE SILON  
ECOSECURITIES CONSULTING LIMITED  
529 SE GRAND AVENUE  
PORTLAND, OR 97214



CATHIE ALLEN  
CA STATE MGR.  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232

SAM SADLER  
OREGON DEPARTMENT OF ENERGY  
625 NE MARION STREET  
SALEM, OR 97301-3737

CLARE BREIDENICH  
224 1/2 24TH AVENUE EAST  
SEATTLE, WA 98112

JESUS ARREDONDO  
NRG ENERGY INC.  
4600 CARLSBAD BLVD.  
CARLSBAD, CA 99208

THOMAS ELGIE  
POWEREX CORPORATION  
1400, 666 BURRAND ST  
VANCOUVER, BC V6C 2X8  
CANADA

## State Service

CLARENCE BINNINGER  
DEPUTY ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE  
455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102

ANDREW CAMPBELL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5203  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BETH MOORE  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PHIL CARVER  
OREGON DEPARTMENT OF ENERGY  
625 MARION ST., NE  
SALEM, OR 97301-3737

LISA SCHWARTZ  
SENIOR ANALYST  
ORGEON PUBLIC UTILITY COMMISSION  
PO BOX 2148  
SALEM, OR 97308-2148

DONALD SCHOENBECK  
RCS, INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660

CHARLIE BLAIR  
DELTA ENERGY & ENVIRONMENT  
15 GREAT STUART STREET  
EDINBURGH, UK EH2 7TP  
UNITED KINGDOM

DAVID ZONANA  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102

ANNE GILLETTE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CATHLEEN A. FOGEL  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHARLOTTE TERKEURST  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5117  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DONALD R. SMITH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

EUGENE CADENASSO  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

HENRY STERN  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 2106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JACQUELINE GREIG  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS BRA  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JASON R. SALMI KLOTZ  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOEL T. PERLSTEIN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5133  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JUDITH IKLE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
ROOM 4012  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHRISTINE S. TAM  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ED MOLDAVSKY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5037  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5036  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JACLYN MARKS  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5306  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JAMIE FORDYCE  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
AREA 5-B  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JEORGE S. TAGNIPES  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JONATHAN LAKRITZ  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5020  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KRISTIN RALFF DOUGLAS  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LANA TRAN  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRIC GENERATION PERFORMANCE BRANCH  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NANCY RYAN  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5217  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RAHMON MOMOH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4205  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SARA M. KAMINS  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SEAN A. SIMON  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

THERESA CHO  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5207  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LAINIE MOTAMEDI  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MATTHEW DEAL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5215  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PAMELA WELLNER  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PEARLIE SABINO  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS BRA  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RICHARD A. MYERS  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SCOTT MURTISHAW  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

STEVE ROSCOW  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BILL LOCKYER  
STATE ATTORNEY GENERAL  
STATE OF CALIFORNIA, DEPT OF JUSTICE  
PO BOX 944255  
SACRAMENTO, CA 94244-2550

KEN ALEX  
PO BOX 944255  
1300 I STREET, SUITE 125  
SACRAMENTO, CA 94244-2550

JUDITH B. SANDERS  
ATTORNEY AT LAW  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MARY MCDONALD  
DIRECTOR OF STATE AFFAIRS  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MICHAEL SCHEIBLE  
DEPUTY EXECUTIVE OFFICER  
CALIFORNIA AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95677

JEFFREY DOLL  
CALIFORNIA AIR RESOURCES BOARD  
PO BOX 2815 1001 I STREET  
SACRAMENTO, CA 95812

B. B. BLEVINS  
EXECUTIVE DIRECTOR  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-39  
SACRAMENTO, CA 95814

DEBORAH SLON  
DEPUTY ATTORNEY GENERAL, ENVIRONMENT  
OFFICE OF THE ATTORNEY GENERAL  
1300 I STREET, 15TH FLOOR  
SACRAMENTO, CA 95814

KAREN GRIFFIN  
EXECUTIVE OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 39  
SACRAMENTO, CA 95814

MARC PRYOR  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST., MS-20  
SACRAMENTO, CA 95814

PIERRE H. DUVAIR  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-41  
SACRAMENTO, CA 95814

BALDASSARO DI CAPO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

JULIE GILL  
EXTERNAL AFFAIRS MANAGER  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

PHILIP D. PETTINGILL  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

EVAN POWERS  
CALIFORNIA AIR RESOURCES BOARD  
1001 I ST, PO BOX 2815  
SACRAMENTO, CA 95812

PAM BURMICH  
AIR RESOURCES BOAD  
1001 I STREET, BOX 2815  
SACRAMENTO, CA 95812

DARYL METZ  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST., MS-20  
SACRAMENTO, CA 95814

DON SCHULTZ  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

LISA DECARLO  
STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-14  
SACRAMENTO, CA 95814

MICHELLE GARCIA  
AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

WADE MCCARTNEY  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

CAROL J. HURLOCK  
CALIFORNIA DEPT. OF WATER RESOURCES  
JOINT OPERATIONS CENTER  
3310 EL CAMINO AVE. RM 300  
SACRAMENTO, CA 95821

HOLLY B. CRONIN  
STATE WATER PROJECT OPERATIONS DIV  
CALIFORNIA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVE., LL-90  
SACRAMENTO, CA 95821

ROSS A. MILLER  
ELECTRICITY ANALYSIS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS 20  
SACRAMENTO, CA 96814-5512